

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

KATHRYN HYLAND, MELISSA GARCIA,  
ELIZABETH TAYLOR, JESSICA SAINT-  
PAUL, REBECCA SPITLER-LAWSON,  
MICHELLE MEANS, ELIZABETH  
KAPLAN, JENNIFER GUTH, MEGAN  
NOCERINO, and ANTHONY CHURCH  
individually and on behalf of all others  
similarly situated,

No. 18-cv-9031-DLC-BLM

Plaintiffs,

v.

NAVIENT CORPORATION and NAVIENT  
SOLUTIONS, LLC,

Defendants.

**PLAINTIFFS' NOTICE OF UNOPPOSED MOTION FOR  
PRELIMINARY APPROVAL OF SETTLEMENT,  
CONDITIONAL CERTIFICATION OF THE SETTLEMENT CLASS,  
APPOINTMENT OF PLAINTIFFS AS CLASS REPRESENTATIVES AND  
PLAINTIFFS' COUNSEL AS CLASS COUNSEL, AND  
APPROVAL OF PLAINTIFFS' PROPOSED NOTICE OF SETTLEMENT**

**PLEASE TAKE NOTICE** that Plaintiffs Kathryn Hyland, Melissa Garcia, Elizabeth Taylor, Jessica Saint-Paul, Rebecca Spitler-Lawson, Michelle Means, Elizabeth Kaplan, Jennifer Guth, Megan Nocerino, and Anthony Church (collectively, "Plaintiffs"), by and through their undersigned counsel, shall move the Court before the Honorable Denise L. Cote, United States District Court Judge, at the United States District Court for the Southern District of New York, Courtroom 18B, 500 Pearl Street, New York, NY 10007-1312, on a date to be selected by the Court, for an order pursuant to Federal Rules of Civil Procedure 23(b)(2) and 23(e) granting (i) preliminary approval of the proposed class action settlement, (ii) conditional certification of the settlement class, (iii) appointment of Plaintiffs as class representatives and Plaintiffs' counsel as

class counsel, and (iv) approval of Plaintiffs' proposed notice of settlement, upon the contemporaneously filed Memorandum of Law and Declaration of Lena Konanova, and all exhibits thereto (the "Motion"). Defendants Navient Solutions, LLC and Navient Corporation do not oppose Plaintiffs' Motion.

Dated: New York, NY  
April 24, 2020

Respectfully submitted,  
SELENDY & GAY PLLC

By: /s/ *Faith Gay*  
Faith Gay  
Maria Ginzburg  
Yelena Konanova  
Margaret Siller  
SELENDY & GAY, PLLC  
1290 Avenue of the Americas  
New York, NY 10104  
Tel: 212-390-9000  
E-mail: fgay@selendygay.com  
mginzburg@selendygay.com  
lkonanova@selendygay.com  
msiller@selendygay.com

Mark Richard  
PHILLIPS, RICHARD & RIND, P.A.  
9360 SW 72 Street, Suite 283  
Miami, FL 33173  
Telephone: 305-412-8322  
E-mail: mrichard@phillipsrichard.com  
(admitted *pro hac vice*)

*Attorneys for Plaintiffs*